

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
	)	CASE NO. 19 B 23697
Devonda Hutchinson,	)	
	)	HON. David D. Cleary
	)	CHAPTER 13
DEBTOR.	)	

**NOTICE OF MOTION**

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on June 8, 2020, at 9:30 a.m. I shall appear before the Honorable David D. Cleary in Courtroom 644 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion.

That a party who objects to the motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on May 18, 2020.

/s/ Aaron Weinberg  
Attorney for Debtors

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

Label Matrix for local noticing 0752-1 Case 19-23697 Northern District of Illinois Eastern Division Wed May 6 15:04:16 CDT 2020	Selene Finance LP as attorney in fact for WI c/o Riezman Berger, P.C. 7700 Bonhomme Avenue, 7th Floor Clayton, MO 63105-1960	WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A c/o Riezman Berger, P.C. 7700 Bonhomme Avenue, 7th Floor Clayton, MO 63105-1960
Wilmington Savings Fund Society, FSB RAS Crane, LLC 10700 Abbott's Bridge Road, Suite 1 Duluth, GA 30097-8458	U.S. Bankruptcy Court Eastern Division 219 S Dearborn 7th Floor Chicago, IL 60604-1702	AT&T PO Box 105262 Atlanta, GA 30348-5262
Advance Cash P.O. Box 10 Parshall, ND 58770-0010	Americash - Bankruptcy Mkt Square Shop Ctr 180 S Bolingbrook Dr Bolingbrook, IL 60440-2852	Bridge Lending Solutions 597 Peace Pipe Road Lac Du Flambeau, WI 54538
CAPITALONE c/o Pollack & Rosen, P.C 1825 Barrett Lakes Blvd Suite 510 Kennesaw, GA 30144-7519	COASTTOCOAST 101 HODENCAMP RD SUITE 120 THOUSAND OAKS, CA 91360-5831	Capital Management Services, LP 698 1/2 S Ogden St Buffalo, NY 14206-2317
City of Chicago 205 W Randolph # 1100 c/o Goldman and Grant Chicago, IL 60606-1813	City of Chicago - Dep't of Revenue PO Box 88292 Chicago, IL 60680-1292	City of Chicago - Parking and red Light Tick Department of Revenue - PO Box 88292 Chicago, IL 60680
City of Chicago Department of Finance c/o Arnold Scott Harris P.C. 111 W. Jackson Ste. 600 Chicago, IL 60604-3517	ComEd 3 Lincoln Center Bankruptcy Section Oakbrook Terrace, IL 60181-4204	Comcast 11621 E. Marginal Way # 5 Bankruptcy Dept Seattle, WA 98168-1965
Commonwealth Edison 3 Lincoln Ctr Attn: Bankruptcy Department Oakbrook Ter, IL 60181-4204	Commonwealth Edison Company Bankruptcy Department 1919 Swift Drive Oak Brook, IL 60523-1502	Convergent 800 SW 39th St/PO Box 9004 Renton, WA 98057-9004
Country Club Hills Municipality 4200 W 183rd Street Country Club Hills, IL 60478-5338	Credit Collection Services 725 Canton Street Norwood, MA 02062-2679	Golden Valley Lending, Inc 635 East Hwy 20, E Upper Lake, CA 95485-8793
HARRIS & HARRIS LTD 222 Merchandise Mart Plaza, Suite 1900 Chicago, IL 60654-1421	IRS Po Box 7346 Philadelphia, PA 19101-7346	Illinois Tollway 2700 Ogden Ave Legal Dept Downers Grove, IL 60515-1703
(p)JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999	LIVNV FND LLC PO Box 10587 Greenville, SC 29603-0587	LIVNV Funding, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

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Municipal Collections of American, Inc.-Vill  
P.O. Box 666  
Lansing, IL 60438-0666

Nicor Gas  
90 N. Finley Road  
Glen Ellyn, IL 60137-6078

North Cash  
PO Box 498  
Hays, MT 59527-0498

Northwood Asset Management Group  
3901 Genesee St  
Buffalo, NY 14225-1944

PENN CREDIT  
Po Box 69703  
Harrisburg, PA 17106-9703

Progressive Auto Insurance  
6300 Wilson Mills Rd  
Cleveland, OH 44143-2182

SELENE FINANCE LP  
9990 RICHMOND AVE STE 40  
HOUSTON, TX 77042-4559

SENTRY CREDIT INC  
2809 GRAND AVE  
EVERETT, WA 98201-3417

US DEPT ED  
PO Box 105081  
Atlanta, GA 30348-5081

Village of Bellwood  
3200 Washington Blvd  
Bellwood, IL 60104-1984

Village of Dolton  
14122 Chicago Road  
Dolton, IL 60419-1098

Village of Dolton  
Municipal Collections of America, Inc  
3348 Ridge road  
Lansing, IL 60438-3112

Village of Hazelcrest  
3000 W. 170th Place  
Hazel Crest, IL 60429-1129

Village of Riverdale  
157 W. 144th Street  
Riverdale, IL 60827-2707

Village of South Holland  
16226 Wausau Avenue  
South Holland, IL 60473-2156

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Municipal Collection Services, Inc	End of Label Matrix	
P.O. Box 327	Mailable recipients	56
Palos Heights, IL 60463-0327	Bypassed recipients	1
	Total	57

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
	)	CASE NO. 19 B 23697
Devonda Hutchinson,	)	
	)	HON. David D. Cleary
	)	CHAPTER 13
DEBTOR.	)	

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Devonda Hutchinson, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtors state the following:

1. On August 22, 2019, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On November 4, 2019, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 21.5% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$650.00 monthly for 36 months.
5. Debtor is in a position to make regular and ongoing trustee payments, if the payments are lowered to \$275.00 per month. Please see Exhibit A. The Trustee payment at \$275.00 per month will still pay the case out at 100% of their allowed claims.
6. Debtor respectfully requests this Honorable Court decrease the current Chapter 13 plan payment to \$275.00 per month.
7. Debtor is in a position to proceed with the instant case.

8. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order decrease the current Chapter 13 plan payment to \$275.00 per month; and
- B. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Aaron Weinberg  
*Attorney for Debtors*

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625